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*Attorneys for Plaintiffs, individually and on behalf
of all others similarly situated and aggrieved*

[Additional counsel on signature page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

TRICIA YEOMANS, ISMAIL CHRAIBI,
ADRIAN RODRIGUEZ, ROBERT
JENKINS, DOROTHY JENKINS,
CAMERON BRADFORD AND FATEMEH
ABTAHI individually and on behalf of all
others similarly situated,

Plaintiff,

v.

WORLD FINANCIAL GROUP
INSURANCE AGENCY, INC., a California
corporation; WORLD FINANCIAL GROUP,
INC., a Georgia corporation; and DOES 1 to
100, inclusive,

Defendants.

Case No. 3:19-cv-00792-EMC

Assigned for all Purposes to:
Hon. Edward M. Chen

**JOINT STIPULATION TO CONTINUE
PENDING DEADLINES AND
HEARING DATES [DKT. 118];
~~PROPOSED~~ ORDER WITH
MODIFICATIONS**

TO THE COURT AND ALL PARTIES:

The Parties to the above-entitled action, by and through their attorneys, stipulate and agree as follows:

WHEREAS, on January 4, 2022, this Court set the following deadlines: (1) completion of private mediation (“by the end of August 2022”); (2) Plaintiffs’ Motion for Class Certification (October 6, 2022); (3) hearing on Plaintiffs’ Motion for Class Certification (November 10, 2022); and (4) Further Status Conference (September 13, 2022). (Dkt. 118).

WHEREAS, the Parties have been engaged in extensive written discovery practice over the past six (6) months;

WHEREAS, Plaintiffs engaged two independent vendors to assist with the document/data preservation, collection and production process in an effort to ensure that the extensive electronic documents and data related to Plaintiffs’ claims are properly preserved, collected, and produced;

WHEREAS, this process has taken many months in light of: (1) the large volume of documents requested; (2) the large number of electronic devices (*i.e.* computers, cell phones, iPads, tablets, etc.) and cloud-based accounts (email, text, etc.) requiring preservation, collection, and production; (3) the various locations of the various electronic devices; (4) numerous technical difficulties encountered while attempting to access several of these devices and accounts; (5) delays resulting from extended collection, processing, review and production time required in light of the volume of data and documents; and (6) Covid-related delays impacting vendor availability, shipping, travel, etc.

WHEREAS, Plaintiffs have been providing regular updates to Defendants regarding the status of the document production;

WHEREAS, in an effort to avoid further delays, Plaintiffs have been providing rolling productions to Defendants over the past several months;

WHEREAS, Plaintiffs anticipate making their final document production within the next fourteen (14) days;

WHEREAS, the Parties have agreed in principle to participate in additional informal discovery once Plaintiffs' document production is complete;

WHEREAS, the Parties have been meeting and conferring regarding the scheduling of Plaintiffs' depositions and the 30(b)(6) deposition(s);

WHEREAS, the first available date for mediation with the Parties' selected mediator (Mr. Mark Rudy) is February 7, 2023;

WHEREAS, based upon their meet and confer efforts and to allow the Parties to focus on the mediation discussed above, the Parties agree (subject to Court approval) to continue the deadlines listed in (Dkt. 118) as follows:

Deadline	Date
Deadline to complete private mediation	March 1, 2023
Plaintiffs' Motion for Class Certification	May 15, 2023
Defendants' Opposition to Motion for Class Certification	June 26, 2023
Plaintiffs' Reply in Support of Motion for Class Certification	July 17, 2023
Hearing on Motion for Class Certification	August 2, 2023, or any date thereafter convenient for the Court
Further Status Conference	September 4, 2023, or any date thereafter convenient for the Court

IT IS HEREBY STIPULATED that, pending this Court's approval, the above identified deadlines shall be adopted by this Court. The Parties shall complete private mediation by March 1, 2023. Plaintiffs' Motion for Class Certification shall be filed on or before May 15, 2023. Defendants' Opposition to Plaintiffs' Motion for Class Certification shall be filed on or before June 26, 2023. Plaintiffs' Reply in Support of Motion for Class Certification shall be filed on or before July 17, 2023. The hearing on the Motion for Class Certification shall be set for August 2, 2023, or any date thereafter that is convenient for the Court. A further Status Conference shall be set for September 4, 2023, or any date thereafter that is convenient for the Court. The Parties will file a Joint Status Conference Statement at least five (5) days prior to the Status Conference. This stipulation shall not be construed as a waiver of any Parties' rights to later seek modification of this schedule, subject to Court approval.

[Signatures on next page]

1 August 30, 2022

MARLIN & SALTZMAN, LLP

2 By: /s/ Karen I. Gold
3 Stanley D. Saltzman, Esq.
4 Karen I. Gold, Esq.
5 Joel M. Gordon, Esq.

6 Attorneys for Plaintiffs, individually and on behalf of
7 all others similarly situated and aggrieved

8 August 30, 2022

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

9 By: /s/ Tim L. Johnson
10 Spencer C. Skeen, Esq.
11 Tim L. Johnson, Esq.
12 Jesse C. Ferrantella, Esq.
13 Cameron O. Flynn, Esq.

14 Attorneys for the Defendants
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ORDER


In view of the parties' foregoing stipulation (Doc. **134**), and good cause having been shown (see Fed. R. Civ. P. 16(b)(4)), the Court hereby MODIFIES the prior deadlines (Dkt. 118) and SETS the following dates and deadlines:

1. Private mediation to be completed by March 1, 2023;
2. Plaintiffs' Motion for Class Certification shall be filed on or before May 15, 2023;
3. Defendants' Opposition to Plaintiffs' Motion for Class Certification shall be filed on or before June 26, 2023;
4. Plaintiffs' Reply in Support of Motion for Class Certification shall be filed on or before July 17, 2023;
5. The motion for class certification shall be heard on **August 3, 2023, at 1:30 PM**;
6. A further status conference is set for **September 5, 2023, at 2:30 PM**;
7. The Parties will file a Joint Case Management Statement at least five (5) days prior to the Scheduling Conference.

IT IS SO ORDERED.

Dated: September 2, 2022

By: _____


Hon. Edward M. Chen
United States District Judge